

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**PLAINTIFFS' CONSENT MOTION RE REPLY PAPERS  
ON MOTION TO COMPEL AND FOR SANCTIONS (ECF #111)**

Plaintiffs hereby move ON CONSENT to extend their time to file reply papers on their motion to compel and for sanctions (ECF #111) to and including October 26, 2021.

October 12,, 2021

/s/ Keisha A. Williams

Joseph Keleman  
Keisha Williams  
WESTERN NEW YORK LAW CENTER  
Cathedral Park Tower  
37 Franklin Street, Suite 210  
Buffalo, NY 14202  
Tel: (716) 828-8415  
Fax: (716) 270-4005  
jkeleman@wnylc.com  
kwilliams@wnylc.com

/s/ Edward P. Krugman

Claudia Wilner  
Edward Krugman  
Anjana Malhotra  
NATIONAL CENTER FOR LAW  
AND ECONOMIC JUSTICE  
275 Seventh Avenue, Suite 1506  
New York, NY 10001  
212-633-6967  
wilner@nclej.org  
krugman@nclej.org  
malhotra@nclej.org

/s/ Chinyere Ezie

Chinyere Ezie  
CENTER FOR CONSTITUTIONAL RIGHTS  
666 Broadway, 7<sup>th</sup> Floor  
New York, NY 10012  
212-614-6475  
CEzie@ccrjustice.org

/s/ Jordan Joachim

Jordan Joachim (admitted *pro hac vice*)  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018  
212-841-1000  
jjoachim@cov.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 12, 2021, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Edward P. Krugman